

1 Rivertown's public inspection plan?

2 A No.

3 Q Did you have any participation in ever publishing
4 any notices in the newspaper concerning the Rivertown
5 application?

6 A We -- just discussing, that's the only aspect. I
7 mean, he, he told me that we would need to do it and so I gave
8 him authority to do it. Yes.

9 Q Who is he?

10 A Dave Brown.

11 Q Dave Brown made the newspaper publications?

12 A Yes.

13 Q I -- your counsel provided you with a copy of
14 Rivertown Exhibit No. 3. Do you have that before you?

15 A Just part of it.

16 Q Only part of it?

17 A Well, yes -- I mean, the whole thing, yes. I was
18 thinking it was longer, but yes that's the whole thing.

19 Q I see in this statement that you worked at radio
20 stations KMCD-AM, KIIK-FM, at Fairfield, Iowa.

21 A Yes.

22 Q And there you did bookkeeping, reception duties,
23 invoicing, traffic, office duties, and network coordinator.
24 Is that correct?

25 A Yes, it is.

1 Q Is this full-time employment?

2 A It was, yes.

3 Q With the addition of possibly accounts payable,
4 you're roughly going to perform the same functions at the
5 Eldon station?

6 A Yes.

7 Q Have you and your husband ever talked about his
8 possible involvement in the construction of the Eldon station
9 if Rivertown should receive the construction permit?

10 A Well, the only thing he would do is maybe help
11 install the heating and air conditioning.

12 MR. WARD: I move to strike as nonresponsive. His
13 question, as I recall, was whether you ever discussed it.
14 Your answer doesn't indicate whether or not you had.

15 JUDGE FRYSIK: All right. Motion granted. Would
16 you answer the question?

17 WITNESS: Not to a great extent.

18 BY MR. NEELY:

19 Q You have discussed it? Yes?

20 A Yes. I would -- I guess, yes.

21 Q All right. And what involvement would Mr. Bowen
22 have in the construction of the Eldon station?

23 MR. WARD: Objection. It's a false premise. It
24 assumes that he will have a role.

25 MR. NEELY: If any. I withdraw the question. What

1 involvement, if any, will Mr. Bowen have in the construction
2 of the Eldon station?

3 JUDGE FRYSIAK: Well, he says you don't have a
4 preliminary --

5 MR. WARD: -- your last question was whether they
6 ever discussed it and then you jump into --

7 MR. NEELY: Will Mr. Bowen -- I withdraw the
8 question. Will Mr. Bowen have involvement in the construction
9 of the station for the -- Rivertown's Eldon station?

10 JUDGE FRYSIAK: Well has it been deci-- the question
11 he wants to ask you is, has an agreement been reached between
12 you and David Brown about your husband's status in the
13 corporation should you get a grant in this case?

14 WITNESS: He would just be a subcontractor, that's
15 all --

16 JUDGE FRYSIAK: Has an agreement been reached
17 between you and David Brown and your husband?

18 WITNESS: No specific agreement.

19 JUDGE FRYSIAK: All right. Go ahead.

20 MR. NEELY: If you don't -- you don't have a
21 specific agreement with, with Mr. Brown. Is there an
22 understanding that he would help? Mr. -- understanding that
23 your husband, David Bowen, would help?

24 JUDGE FRYSIAK: Where? Which -- whose
25 understanding? Her understanding?

1 MR. NEELY: Yes.

2 JUDGE FRYSIAK: All right.

3 WITNESS: It's a possibility.

4 MR. NEELY: If you're to get the C.P., you're pretty
5 certain that he would help?

6 WITNESS: Just in certain areas. I mean, plumbing,
7 heating, refrigeration, air conditioning --

8 JUDGE FRYSIAK: You're in a speculative realm, you
9 know. It doesn't help the record that much.

10 BY MR. NEELY:

11 Q Your husband was present when David Brown first made
12 the proposal to you about joining the Rivertown Corporation.
13 Is that correct?

14 A Yes.

15 Q And would you say that your husband has been present
16 at all of the meetings that you've had with Dave Brown about
17 the Rivertown station?

18 A Most of them. Just in the fact that most of the
19 meetings have been at our house.

20 Q The, the \$45 check we were discussing earlier, what
21 account was that drawn on?

22 A Our personal account.

23 Q Was that a joint account?

24 A Yes.

25 MR. NEELY: Okay. I have no further cross-

1 examination of this witness, Your Honor.

2 JUDGE FRYSIAK: All right. Is there any redirect?

3 MR. WARD: Very little.

4 REDIRECT EXAMINATION

5 BY MR. WARD:

6 Q With respect to publication of the local notices in
7 the Eldon paper concerning the filing of the application and
8 the, the hearing, who, who wrote the checks for the bills for
9 those?

10 A I signed the checks.

11 Q Did the bills come to you or did they come directly
12 to Dave and he sent them to you for payment or what?

13 A I think they came to the post office box, Dave
14 picked them up and gave them to me to si-- I mean, to issue
15 the check and mail it.

16 Q Have, have you and Dave Brown had any discussion
17 about the possibility that, that your husband, Dave Bowen,
18 might be involved in constructing this station?

19 A Just to the extent of helping install the plumbing,
20 heating --

21 Q My question is, have you and Dave Brown had that --
22 had any discussion?

23 A Well, yes, to the, to the extent I was going to say.

24 Q Okay. When was, when was that discussion?

25 JUDGE FRYSIAK: Install what? Did you say plumbing?

1 WITNESS: Yes. That's the profession my husband
2 has.

3 JUDGE FRYSIAK: I see.

4 BY MR. WARD:

5 Q Do you recall when, when that discussion was held?
6 Or was it more than one discussion?

7 A Oh, yes. I mean, you know. Talk about it here and
8 there.

9 Q Where, where would that plumbing and heating work be
10 done?

11 A Wherever the building for the radio station would
12 be. Once the building got put up. Or wherever the office is.

13 Q If you're renting an existing building, it would --
14 presumably have plumbing and heating already, would it not?

15 MR. NEELY: Objection, speculative.

16 MR. MILLER: Presumably if you're --

17 MR. NEELY: It's very speculative, Your Honor.

18 BY MR. WARD:

19 Q Do the buildings -- are buildings and plum-- in
20 Eldon plumbed and heated already?

21 A We had to do some maintenance on --

22 Q I beg your pardon?

23 A The building that we have right now, we had to do
24 some maintenance on it.

25 Q The building we have -- where? In Eldon?

1 A In Eldon.

2 Q Who, who has a building in Eldon?

3 A My husband and Dave Brown.

4 Q Okay. And they have already done some plumbing and
5 heating work in that building?

6 A Yes.

7 Q How old is that building?

8 A It's pretty old.

9 Q Well, so am I.

10 JUDGE FRYSIK: What is that -- I'm missing
11 something. This building that you -- your husband and David
12 Brown own --

13 WITNESS: In Eldon.

14 JUDGE FRYSIK: Is that any connection with this
15 proceeding so far? Or is that just an investment that they
16 have?

17 WITNESS: It's a possible site of the radio station.

18 JUDGE FRYSIK: I see.

19 MR. WARD: For the, for the studio, you mean?

20 JUDGE FRYSIK: Should you get a grant, would you
21 put the studio there? Is that it?

22 -- WITNESS: It's a possible site.

1 some --

2 A Yes.

3 Q -- or your husband has already done some plumbing
4 and heating work in that building?

5 A Yes.

6 Q Yeah. Is -- would it be fair to say that your
7 husband's plumbing and heating business -- well, let me back
8 up. Are you familiar generally with your husband's plumbing
9 and heating business from a business standpoint?

10 A Yes.

11 Q You see his. his bills and his receivables and his

1 have seen his -- some of his bank account figures, but -- he's
2 got, he's got a successful plumbing and heating business --

3 JUDGE FRYSIAK: I know what you're driving at, but
4 the objection to the question was, was that you didn't tell a
5 sufficient predicate to ask her for -- ask her whether the
6 business is successful or not. I think you can ask other
7 questions though to get --

8 BY MR. WARD:

9 Q Is he, is he, is he kept busy full-time with his
10 plumbing and heating?

11 A Yes.

12 Q Work at least 40 hours a week in the plumbing and
13 heating business?

14 A Yes.

15 MR. WARD: I have, I have no further questions, Your
16 Honor.

17 JUDGE FRYSIAK: All right --

18 MR. NEELY: No further cross-examination for this
19 witness.

20 JUDGE FRYSIAK: All right. Thank you very much,
21 Mrs. Bowen. You're excused.

22 WITNESS: Thanks.

23 MR. WARD: I had, I had assumed we were going to
24 follow sequestration and I put Mr. Brown down the hall here,
25 so maybe we could take a brief --

1 JUDGE FRYSIK: All right. Want to take a short
2 recess? Five minutes?

3 (Whereupon, off the record from 10:52 a.m. to 10:59
4 a.m.)

5 JUDGE FRYSIK: All right. We're back on the
6 record. Before you sit down, Mr. Brown, may I take an oath.
7 Please raise your right hand.

8 Whereupon,

9 DAVID BROWN

10 having been first duly sworn, was called as a witness herein
11 and was examined and testified as follows:

12 JUDGE FRYSIK: All right. Would you please have a

1 Q And, and Exhibit 4?

2 A Um-hum.

3 Q Good.

4 MR. WARD: Your Honor, at our admission session last
5 month, we identified and had rulings on Exhibits 1 through 3.

6 JUDGE FRYSIK: Yes.

7 MR. WARD: As I mentioned earlier this morning.

1 WITNESS: Yes, it is.

2 MR. WARD: Is that, is that exhibit true and
3 correct?

4 JUDGE FRYSIK: If you want to make any changes --

5 MR. WARD: Any, any corrections to it?

6 WITNESS: Not that I see. No.

7 JUDGE FRYSIK: All right.

8 BY MR. WARD:

9 Q And turning to Exhibit 2. Your signature appears on
10 the fifth page, does it not?

11 A Yes, it does.

12 Q Are there any, any corrections to that exhibit?

13 A On page 2, the bottom paragraph. The dates should
14 be March 1992 to May 1992.

15 Q In, in lieu of the last line on that page?

16 A Yes, in place of May --

17 Q May 1992 to September 1992 should be changed to
18 March 1992 to May 1992?

19 A Yes, sir.

20 Q Aside from that correction, is this exhibit true and
21 correct?

22 A Yes.

23 MR. WARD: And at this point, Your Honor, I would
24 like to have identified Rivertown Exhibit 4, a six-page
25 affidavit of David W. Brown.

1 BY MR. WARD:

2 Q Do you have a copy of that in front of you, Mr.
3 Brown?

4 A Yes, I do.

5 Q Is that your signature on the last page?

6 A Yes, it is.

7 Q Is that, is that statement true and correct?

8 A Yes.

9 MR. WARD: Your Honor, I understand there may be
10 some objections to that exhibit and I would like to offer it
11 at this point in order to permit --

12 JUDGE FRYSIK: All right -- it is marked. You're
13 offering it now?

14 (Whereupon, the document referred to
15 as Rivertown Exhibit No. 4 was marked
16 for identification.)

17 MR. WARD: Yes, sir.

18 JUDGE FRYSIK: All right. Mr. Neely, any
19 objections?

20 MR. NEELY: Yes, Your Honor. I have objection to
21 Rivertown Exhibit No. 4 that's just been identified and
22 marked. Paragraph 3, appearing on page 2 of the exhibit.
23 Paragraph 2 is -- pardon me, paragraph 3. I misspoke.
24 Paragraph 3 is Mr. Brown's testimony as to what he was
25 allegedly told by Dale Wagner regarding an August 10th, 1991,

1 meeting. I object to this paragraph as -- certainly as
2 hearsay and perhaps even double-hearsay. There's no testimony
3 from Mr. Wagner under oath in this proceeding, or from Richard
4 Brown, the other person who's purportedly present at this
5 meeting. And I would submit that David Brown as, as not being
6 present at the meeting, cannot provide testimony about a
7 conversation at which he was not present and, therefore, this
8 paragraph is unreliable as a basis on which to write findings
9 and conclusions in this proceeding. I would cite for
10 precedent as not admitting hearsay evidence, Ramon Rodriguez
11 and Associates at 7 FCC Rec. 2633, it's a 1992 case.

12 MR. WARD: Your Honor, if this, if this were the
13 only piece of evidence on the subject, I'd be inclined to --
14 I'd be more than inclined. I wouldn't have offered it. But
15 with --

16 JUDGE FRYSIK: Where -- what other evidence have we
17 got so far that Carmela Sample is a front?

18 MR. WARD: Well, this -- there were conversa-- the
19 rest of this affidavit recites conversations between Mr. McVey
20 himself and, and Mr. Brown on the same subject. And this --
21 in fact, Mr. McVey in, in his own testimony on behalf of, of
22 Sample, has essentially conceded that, that such conversations
23 occurred and sought to characterize them to a certain
24 exculpatory fashion, but --

25 JUDGE FRYSIK: Who made those concessions? I

1 missed you.

2 MR. WARD: I said Mr. McVey in his own testimony in
3 Sample's exhibits essentially sees that, that this --

4 JUDGE FRYSIK: Uh, yeah --

5 MR. WARD: -- subject that has come up in his
6 various conversations, but this is just another, another piece
7 of evidence or -- even though it's hearsay, I, I submit that
8 it --

9 JUDGE FRYSIK: Well, I'm sorry. We're going to
10 have to rely on what McVey has to say unless you're going to
11 produce Wagner or Mr. Brown.

12 MR. WARD: Well, we'll, we'll talk to Mr. McVey
13 about that then. Thank you.

14 JUDGE FRYSIK: I'm going to have to grant the
15 motion. You may strike paragraph 3.

16 MR. NEELY: A further objection, Your Honor, to
17 paragraph number 4 of the immediately next -- well, pardon me.
18 Not paragraph number 4; paragraph number 6. That's on page 4
19 of Exhibit 4. Paragraph number 6. Paragraph number 6
20 describes Mr., Mr. David Brown's description of a conversation
21 or remarks that Mr. Bill Collins made to David Brown. We have
22 as Exhibit No. -- Rivertown Exhibit No. 5 is a statement by
23 Mr. Collins where Mr. Collins explains his own statements and
24 what he meant by them, what he understood. It's not proper
25 evidence for Mr. Brown to be describing Mr. Collins'

1 statements. It's redundant and unreliable. We have Mr.
2 Collins' statements and we do not propose to object to the
3 admission of Mr. Collins' statements.

4 MR. WARD: On that basis, I have no objection to
5 striking paragraph 6 from Mr. Brown's testimony.

6 JUDGE FRYSIAK: All right. Motion granted. Strike
7 6 -- paragraph 6.

8 MR. NEELY: And if I might have some voir dire on
9 paragraph number 7.

10 JUDGE FRYSIAK: Go ahead.

11 VOIR DIRE

12 MR. NEELY: Mr. Brown, you've identified this
13 Rivertown Exhibit 4 as your testimony. I would ask you to at
14 this time, please review to yourself paragraph number 7.

15 WITNESS: Yes.

16 MR. NEELY: You finished your review of this
17 paragraph?

18 WITNESS: Yes.

19 MR. NEELY: The last sentence of this paragraph, are
20 you saying that Mr. McVey's statements to you about the Eldon
21 applications represent no more than his own personal opinion,
22 unaided by any substantive input from either Carmela Sample or
23 Bruce Linder?

24 MR. WARD: Objection. That's a mis -- total
25 mischaracterization --

1 JUDGE FRYSIAK: Well, he's asking him whether that's
2 a fair characterization. Was it -- right?

3 MR. NEELY: Yes, Your Honor.

4 WITNESS: What was the question again?

5 MR. NEELY: The last sentence of paragraph 7, are
6 you saying that Mr. McVey's statements to you about the Eldon
7 applications represent no more than Mr. McVey's own personal
8 opinion, unaided by any substantive input from either Carmela
9 Sample or Bruce Linder.

10 WITNESS: No, I'm not implying that.

11 MR. WARD: Your Honor, may, may I make a suggestion.
12 If -- the predicate for this, for this paragraph is Mr.
13 McVey's draft testimony dated May 10. Now, I didn't happen to
14 bring -- it's, it's Sample's, Sample's Exhibit 5. I didn't
15 happen to bring that with me, but if, if he's going to ask
16 questions about this paragraph, I think it's probably better
17 that he have available to him and I suppose you do have it
18 with you, that, that particular testimony, because that's,
19 that's the whole predicate to this paragraph. He's, he's
20 discussing Mr. McVey's testimony. Could that -- would, would
21 you have that available? Do you have Mr. McVey's -- do you
22 have your Sample Exhibit 5 with you?

23 WITNESS: Um-hum. Could I have the question again?

24 MR. NEELY: On paragraph number 7 -- I don't

1 | you saying in the last sentence of paragraph number 7 -- are
2 | you saying that Mr. McVey's statements to you about the Eldon
3 | applications represent no more than his own personal opinion,
4 | unaided by any substantive input from either Carmela Sample or
5 | Bruce Linder?

6 | WITNESS: All I know is the information that was
7 | said I believed to be true at the time. I had no way of
8 | knowing other than that whether it was his personal opinion or
9 | not.

10 | JUDGE FRYSIK: Well, you seem to be saying that he
11 | denied saying that because he doesn't recall having said that.

12 | WITNESS: Right.

13 | JUDGE FRYSIK: But then you say that your
14 | impression is that he agreed with what you said. Is that what
15 | you're saying?

16 | WITNESS: He --

17 | JUDGE FRYSIK: He agreed that -- the impression
18 | that you -- you've made by your statement -- all right?
19 | You're, you're arguing in that last sentence that although he
20 | denied any specific knowledge of having made those statements,
21 | he agrees with what you had said except for the fact that you
22 | failed to mention that it was his personal opinion and --

23 | MR. WARD: Your Honor --

24 | JUDGE FRYSIK: -- direct conversations with Mr. --

25 | MR. WARD: Your Honor, I think you -- excuse me. I

1 think you skipped a line in reading --

2 JUDGE FRYSIAK: Pardon?

3 MR. WARD: I think you skipped a line in, in reading
4 Mr., Mr. Brown's testimony. He says in denying any specific
5 knowledge concerning the intentions of Mrs. Sample and Mr.
6 Linder at the time he made such statements to me, Mr. McVey
7 appears to be conceding my affidavit -- it's, it's --

8 JUDGE FRYSIAK: All right. Okay.

9 MR. WARD: But --

10 JUDGE FRYSIAK: We seem to think that the sentence
11 is vague and at least we're trying to --

12 MR. WARD: Maybe, it's a --

13 JUDGE FRYSIAK: I better read on it. Maybe the
14 witness can help us. Just what do you intend to say in that
15 paragraph 7?

16 WITNESS: Is that he didn't deny any of it, whether
17 it was his personal opinion or not.

18 JUDGE FRYSIAK: I see.

19 MR. WARD: If it's, if it's unclear, perhaps -- I, I
20 recognize that this is --

21 JUDGE FRYSIAK: Well --

22 MR. WARD: -- this is, this is Mr., Mr. Brown's sort
23 of characterization of Mr. McVey's testimony and it's, it's
24 sort of two levels beyond the events involved. Maybe we could
25 just -- I would -- if nobody -- even -- if even Mr. Neely

1 | doesn't understand, then I think we might as well --

2 | JUDGE FRYSIAK: Well, he says that --

3 | MR. WARD: I would welcome a motion to strike it,

4 | because --

5 | MR. MILLER: Either that or you could withdraw it.

6 | MR. WARD: We, we withdraw that last sentence. That

7 | is --

8 | JUDGE FRYSIAK: The last sentence is a long one.

9 | MR. MILLER: Or the whole paragraph.

10 | JUDGE FRYSIAK: In denying any specific knowledge?

11 | Is that where the sentence begins?

12 | MR. WARD: Yes, it is.

13 | JUDGE FRYSIAK: All right. Strike the last sentence

14 | of paragraph 7.

15 | MR. NEELY: I --

16 | JUDGE FRYSIAK: Go ahead.

17 | MR. NEELY: I would move that we strike the entire

18 | paragraph 7. They appear conclusionary and argument to some

19 | extent and I think that the facts are what the facts are and

20 | we'll draw our own findings and conclusions.

21 | JUDGE FRYSIAK: Well, stating his impression -- you

22 | can cross-examine him on that. I'll overrule your objection.

23 | MR. NEELY: I have no further objections to Exhibit

24 | -- Rivertown Exhibit No. 4.

25 | JUDGE FRYSIAK: Okay. I'll receive 4 then as, as

1 amended. Is the witness available now for --

2 (Whereupon, the document referred to
3 as Rivertown Exhibit No. 4 as amended
4 was received into evidence.)

5 MR. WARD: He is indeed, Your Honor.

6 JUDGE FRYSIK: All right.

7 CROSS-EXAMINATION

8 BY MR. NEELY:

9 O Mr. Brown, I'm going to be asking you some questions

1 MR. NEELY: -- him a copy of an amendment, Petition
2 for Leave to Amend the Rivertown Communications Company, Inc.,
3 application. The amendment is two pages long with a signature
4 date of July 7, 1992. There is an attachment to the
5 amendment, a statement titled Amendment and purportedly signed
6 by David W. Brown.

7 BY MR. NEELY:

8 Q Mr. Brown, is this is your signature on the
9 statement I just referred to?

10 A Yes.

11 Q Have you seen this Petition for Leave to Amend
12 before today?

13 A Yes, I have.

14 Q And your -- this statement talks about your -- that
15 you are currently employed as the General Manager at stations
16 WIAK-AM and WGBQ-FM, Galesburg, Illinois?

17 A As of that date, yes, I was.

18 Q And was that as of -- currently as of what date, for
19 the record?

20 A June 30th, 1992, according to this amendment here.

21 Q Is this amendment accurate?

22 A To the best of my knowledge it is.

23 MR. NEELY: Is counsel for Rivertown willing to
24 stipulate that this is the first amendment to the Rivertown
25 application reporting the Galesburg employment of Mr. Brown?

1 MR. WARD: Certainly.

2 MR. NEELY: For purposes of keeping the record
3 complete so that we know what we're talking about when we read
4 the transcript, I'd like to offer this exhibit as Sample
5 Exhibit No. 7, I'd like to offer this into evidence.

6 JUDGE FRYSIK: You may have it marked, yes.

7 (Whereupon, the document referred to
8 as Sample Exhibit No. 7 was marked
9 for identification.)

10 MR. WARD: Are you talking about the Judge's
11 amendment or the petition or what?

12 MR. NEELY: The, the entire document. All three
13 pages. Two page Petition for Leave to Amend, with the one
14 paragraph statement signed by David W. Brown and dated June
15 30, 1992.

16 JUDGE FRYSIK: All right.

17 MR. WARD: What number is that? I'm sorry.

18 MR. NEELY: That would be Rivertown -- pardon me.
19 That would be Sample --

20 JUDGE FRYSIK: Number 7.

21 MR. NEELY: -- Exhibit 7. As it's been --

22 JUDGE FRYSIK: It's been marked. Do you want it,
23 do you want it offered?

24 MR. NEELY: I would like to offer this in evidence
25 at this time.

1 JUDGE FRYSIAK: All right.

2 MR. WARD: May I -- I, I would, I would object on
3 grounds of relevance and materiality.

4 JUDGE FRYSIAK: Well, you're going to have to clue
5 me in because I -- I'm in the dark. I -- because --

6 MR. WARD: I mean, there's no, there's no issue as
7 to, as to Mr. Brown's having served, albeit it very briefly,
8 as general manager of WAIK or whatever in, in Galesburg.
9 What's, what's the relevance in --

10 JUDGE FRYSIAK: Divestiture?

11 MR. WARD: Well --

12 JUDGE FRYSIAK: Is that, is that your point?

13 MR. NEELY: Yes, Your Honor.

14 MR. WARD: I guess his point is because this wasn't

1 JUDGE FRYSIAK: And this only expedites, you know,
2 the situation, so I find it unobjectionable. I'll receive it.

3 (Whereupon, the document referred to
4 as Sample Exhibit No. 7 was received
5 into evidence.)

6 MR. WARD: Without -- okay.

7 JUDGE FRYSIAK: And as far as the, the weight that I
8 attach to it, why, you can argue in your proposed findings.

9 MR. NEELY: I would seem to have not brought
10 sufficient copies for the reporter. I seek leave to withdraw
11 the exhibit, make copies and bring them back at this
12 afternoon's session.

13 JUDGE FRYSIAK: Yes. Permission granted.

14 MR. NEELY: Thank you. I would also like to, to
15 move that Your Honor take for official notice that the last
16 day to file amendments -- in the Eldon proceeding was March
17 2nd, 1992.

18 JUDGE FRYSIAK: If there's no objection to that,
19 I'll consider it as a stipulation. And it's noted on the
20 record. Thank you. Go ahead.

21 BY MR. NEELY:

22 Q Mr. Brown, do you and David Bowen own a building
23 together in Eldon, Iowa?

24 A Yes.

25 Q And what is the address of that building?